

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-cv-01776 (JRT/JFD)

This Document Relates to:

*The Actions of Certain DAPs and The
Commonwealth of Puerto Rico*

MOTION TO COMPEL

Certain DAPs¹ and the Commonwealth of Puerto Rico respectfully move this Court to compel JBS USA (“JBS”) to prepare and provide a witness for the 30(b)(6) deposition of JBS on the following portions of Topics 20 and 23 of the Amended Notice:

Topic 20: Your policies and/or codes of conduct, including any discussions of: communications with competitors or their employees; participation in industry trade groups, conferences, or meetings; . . . and compliance with, or training related to, the antitrust laws.

Topic 23: The existence and language of Your written policies and/or codes of conduct concerning: communications with competitors or their employees; participation in industry trade groups, conferences, or meetings; . . . and compliance with, or training related to, the antitrust laws (including certification and frequency of such training). This Topic includes when and how the language of such written policies were changed.

¹ “Certain DAPs” are Sysco Corporation and Amory Investments LLC.

Dated: November 14, 2022

Respectfully submitted,

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